



*(English Translation)*

**AIRA & AIFUL Public Company Limited**  
**Personal Data Protection Policy**

**A. Reason for the Issuance of the Policy**

In order to comply with Personal Data Protection Act B.E. 2562 (PDPA) including amendment, rule, regulation, announcement, guidelines and order of the Office of Personal Data Protection and/or related government offices, AIRA & AIFUL Public Company Limited (hereafter called "the Company") deems it appropriate to set forth the personal data protection policy to be standard in defining guideline, criteria and practice to protect personal data of customers, trade partner, contact partner, shareholder, director, management, staff and/or employee of the company including any person conducting the transaction with company.

**B. Objective**

In order to ensure compliance with the Personal Data Protection Act, B.E. 2562 (2019) which may have further amendments relating to the collection, use and disclosure of personal data and sections of the rights of the data subject, Company practices guidelines for general implementation across the entire organization, the Company deems it fitting to set forth a policy concerning the supervision of information for use as a rule in order to protect personal and confidential information.

**C. Scope of Enforcement**

This policy shall apply to data obtained from data subjects and other sources as well as third parties who contact and conduct transactions with the Company, regarding collection, use and disclosure of personal data obtained through work activities and prevent personal data from leaking to the public or uninvolved third parties or any personal data breach including to prevent complaints from the data subject.

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## Section 1

### General Articles

#### Clause 1. Definitions

“Company” means AIRA & AIFUL Public Company Limited along with its branches and temporary booths.

“Employees” means an employees of of AIRA & AIFUL Public Company Limited working at the main office or branch office. This includes any employee working off-site representing the Company to engage in the Company's public relations activities or collection, use, or disclosure of data.

“Personal Data” means any information relating to a person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Persons in particular.

“Sensitive Data” means any personal data pertaining to racial, ethnic, origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may affect the data subject in the same manner, as prescribed by Law.

"Data protection officer" means single person or multiple persons which has been designated as Data Protection Officer (DPO) with duties as specified in the Personal Data Protection Act B.E. 2562 (2019) that may have further amendments.

"Loan" means the granting of personal loan as part of the Company's business activities.

"Third party" means a contract partner, trade partner, or person who conducts transactions with the Company by any means, including any employee, representative, trade partner and contact of the aforementioned individuals in the entire chain of command.

**Clause 2.** Legal Department shall be the acting person in charge and in control of compliance with this policy, which includes examination and evaluation of rules, regulations, requirements, manuals and/or any practice guidelines in order to ensure the successful implementation of this policy by submitting requests for approval to authorized persons in line with the Company's delegation of authority policy.



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### **Clause 3. Collection of Personal Data**

The company shall collect personal data such as;

1. Data able to identify person such as name, address, birthday, nationality, ID number, contact location, mobile phone numbers, photos, etc.
2. Data related to male or female.
3. Electronic Information, mobile phone number, E-mail, electronic card number, Computer serial number (IP address), browser, domain, website, website address with reference of date and time of visiting including membership or request for service on the website.
4. Various settings and services of personal information etc.
5. The Company shall collect sensitive data when obtain explicit consent from data subject, except permitted by the Law without consent.

## **Section 2 Personal Data Acquisition**

**Clause 4.** The Company collects personal data from the following sources;

- 4.1 Directly from the data subject, the Company may collect personal data from the following cases.
  - A. Loan application procedure, applying for service or submitting various requests to the Company.
  - B. The voluntary of the data subject in questionnaire (Survey).
  - C. Interaction by electronic mail (E- mail) or other communication channels between the Company and the data subject.
  - D. Use of Cookies on the web browser's cookies of the data subject
  - E. Record of web visitors (Log Files) of the company
  - F. Data on website (Website).



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4.2 Personal data specifies links from third parties or other sources as follows:

- A. Partner companies.
- B. Data from general searching such as public disclosure, internet, government agencies or other organizations and etc.
- C. Data sources via E-mail, telephone, fax and / or any documents etc.

### **Section 3**

#### **The objectives of collection, use and disclosure of personal data**

**Clause 5.** The company shall collect, use and disclose personal data in respect of approval, analysis, processing, providing services, quality improvement, sending, transferring, exchanging data, assessment of website functionality or electronic channel, advertising the Company's product, proposing loan or modifying or adjusting website to align with modern trend and easy to use, promotion, other special offers, the Company's internal enforcement and protection of personal data acquired from other sources including transferring data to a foreign country, that receives such data shall have adequate data protection standard or relating law and other regulations.

### **Section 4**

#### **Personal Data Processing**

**Clause 6.** After received personal data from source, the Company will process the aforementioned personal data.

Collection, use and disclosure are in accordance with the purpose of collection and use of personal data for business purposes, quality improvement, following up services of the company including another purpose with respect to other services as necessary under this policy.

In this regard, the person or organization, which the Company may disclose aforementioned personal data, has a duty under the law to maintain and protect personal data or anyone who may receive personal data from the data subject. Hence, the Company shall send a personal data to Credit agency to validate and may use the results of the data validation to prevent fraud.



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The Company may transfer the personal data to a foreign country or international organization for the purposes of collection, use and disclosure of personal data. The destination country or international organization that receives such personal data shall have adequate data protection standard.

### **Section 5**

#### **Retention and retention period of Personal Data**

**Clause 7.** The company shall establish the following for retention of personal data:

1. Store in hard copies and/or soft copies.
2. Store in computer system of the Company in the Company
3. The retention period of the personal data is according to the period of the personal data processing as required by law.
4. When the retention period ends or the Company has no rights or ability to claim the basis for collection of personal data, the Company will destroy the personal data in an appropriate and complete within period required by law.

Retention period of the personal data, personally identifiable data such as name, address, contact location, mobile phone number, E-mail is 10 years from the date of the contract termination.

### **Section 6**

#### **Rights of Data Subject**

**Clause 8.** The data subject shall have the right to request the Company to process as following;

1. **Right to withdraw consent**, the data subject shall have the right to withdraw the consent to collect, use or disclose of personal data that the data subject had already given a consent to the Company at any time.
2. **Right to request access the personal data**, the data subject is entitled to request access to obtain copy of the personal data related to him or her, which is under the responsibility of the Company or to request the disclosure of the acquisition of the personal data obtained without his or her consent.
3. **Right to rectification of personal data**, the data subject shall have the right to request the Company to ensure that the personal data remains accurate, up-to-date, complete and not misleading.



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4. **Right to request to erasure of personal data**, the data subject shall have the right to request the Company to erase or destroy the personal data, or anonymize the personal data to become the anonymous data, which cannot identify the data subject for some reason.

5. **Right to request to restrict the use of the personal data**, the data subject shall have the right to request the Company to restrict the use of personal data for some reason.

6. **Rights to request to transfer the personal data**, the data subject shall have the right to request the Company to send or transfer the personal data to other data controllers or directly obtain to him or her for some reason.

7. **Rights to object the collection, use or disclosure of the personal data**, the data subject shall have the right to object the collection, use or disclosure of the personal data for some reason.

**Clause 9.** The data subject can contact Data Protection Officer (DPO) of the Company in order to submit a request regarding above rights of data subject or the data subject can study details, exceptions for the exercise of various rights via the website.

Regarding the above rights of data subject, the Company will consider and inform the result of the consideration of the request within 30 days from the date of the Company receives the request.

## **Section 7**

### **Data Protection Officer**

**Clause 10.** The Company has implemented in accordance with the Personal Data Protection Act B.E. 2562 (2019), by appointing the Data Protection Officer (DPO) to check the Company's operations regarding the collection, use and disclosure of personal data in accordance with the Personal Data Protection Act B.E. 2562 (2019), including laws related to personal data protection, order for related parties to perform as specified to ensure the implementation of this policy to be completed.



## Section 8

### Maintaining Information Security

**Clause 11.** For the benefit of maintaining the confidentiality and security of personal data, the Company has the following measures;

1. Define rights to access, use, disclosure and process of personal data including displaying or verifying the identity of person who access or use personal data in accordance with the company's policy or manual strictly.

2. For the case of sending or transferring personal data to foreign country including the collection of personal data on a database in any other system, the destination country that collects such personal data shall have equivalent or greater protection measures in accordance with the policy.

3. The Company shall provide appropriate security measures for preventing the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of personal data, and such measures must be reviewed when it is necessary, or when the technology has changed in order to efficiently maintain the appropriate security and safety.

4. In the event of a violation of the Company's security measures causing violation of personal data or personal data leaked to the public, the Company will notify proceed the data subject as soon as possible, in additions in the event of the Company defect, the company shall propose a remedial plan for damage from breach or leakage of personal data to the public.

However, the Company will not be responsible for any damage arising out of the use or disclosure of personal data to third parties including neglecting or ignoring to log out of the database or online social communication system by the actions of data subject or other persons with the consent of the data subject.

5. The company conducts review and evaluation of the effectiveness of standards for personal data security.

## Section 9

### Marketing activities and marketing promotions

**Clause 12.** When receives the consent from data subject, the Company will provide news related to marketing activities and promoting the marketing, products, or any services of the Company to the data subject for receiving the benefits of providing services from the Company. The data subject shall have the right to receive or withdraw consent to receive such information from the Company.



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### **Section 10**

#### **Penalties**

**Clause 13.** Employees, executives and / or the person who is responsible for the operation of any matter under their duties if ignore or neglect to command or not to perform or order or perform any of their duties causes violation of policies or practices regarding personal data leading to violate the law or any damage. Employees, executives and / or the responsible person, that person must be disciplined according to the company's regulations or must be responsible for the said act according to the offense that occurred. Therefore, in case that such offense causes damage to the company and/or other person, the Company may consider legal proceeding.